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10 Attorneys for PLAINTIFF
11 ROBERT HUNTER BIDEN

12 **UNITED STATES DISTRICT COURT**

13 **CENTRAL DISTRICT OF CALIFORNIA - WESTERN DIVISION**

14 ROBERT HUNTER BIDEN, an
individual,

15 Plaintiff,

16 vs.

17 PATRICK M. BYRNE, an individual,
18 Defendant.

Case No. 2:23-cv-09430-SVW-PD

**PLAINTIFF ROBERT HUNTER
BIDEN'S REQUEST FOR
COUNSEL TO APPEAR
REMOTELY FOR MARCH 17, 2025
HEARING ON PLAINTIFF
ROBERT HUNTER BIDEN'S
MOTION TO COMPEL
COMPLIANCE WITH *TOUHY*
REQUEST; DECLARATION OF
BRYAN M. SULLIVAN**

*[[Proposed] Order filed and served
concurrently herewith]*

Date: March 17, 2025
Time: 1:30 P.M.
Crtrm.: 10A

Judge: Hon. Stephen V. Wilson

1 **TO THE HONORABLE COURT, ALL PARTIES AND THEIR**
2 **ATTORNEYS OF RECORD**, Plaintiff Robert Hunter Biden (“Plaintiff”) hereby
3 respectfully requests permission from this Court for his Counsel, Bryan M. Sullivan,
4 Esq., to appear remotely by way of videoconference (e.g. Zoom) for the hearing on
5 Plaintiff’s Motion To Compel Compliance With *Touhy* Request scheduled in this case
6 for March 17, 2025 at 1:30 p.m. (the “Hearing”). Good cause exists to grant this
7 request because Mr. Sullivan along with Zachary Hansen, Esq., will be trial counsel
8 on the case and has been involved in all aspects of the case. (Declaration of Bryan
9 M. Sullivan, at ¶ 2.) However, at this time, Mr. Sullivan is unable to be in the State
10 of California on March 17, 2025, due to the fact that he resides in Virginia and has
11 family/child care obligations that prevent him from traveling to California and
12 attending the Hearing in person at that time. Mr. Hansen, who will be trial counsel
13 with Mr. Sullivan on the case and also has been involved in all aspects of the case will
14 be appearing in person for the Hearing, so Plaintiff will have another attorney present
15 in person for this Hearing. (Declaration of Bryan M. Sullivan, at ¶ 3.) Accordingly,
16 Plaintiff respectfully requests that the Court grant this request for Mr. Sullivan to
17 appear remotely by videoconference at the Hearing.

18 Dated: February 28, 2025

EARLY SULLIVAN WRIGHT
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21 By: /s/ Bryan M. Sullivan

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Attorney for Plaintiff
Robert Hunter Biden



DECLARATION OF BRYAN M. SULLIVAN

I, Bryan M. Sullivan, declare and state as follows:

1. I am counsel of record for Plaintiff Robert Hunter Biden (“Plaintiff”) in the above-entitled action and am over the age of 18. I hereby submit this declaration in support of Plaintiff’s Request for Counsel to Appear Remotely for the hearing on Plaintiff’s Motion To Compel Compliance With *Touhy* Request scheduled in this case for March 17, 2025 at 1:30 p.m. (the “Hearing”). If called as a witness, I would and could testify to the matters contained herein.

2. I have been involved in all aspects of this case and will be trial counsel for this with my colleague Zachary Hansen, Esq., and my participation in the Hearing is, therefore, necessary.

3. I am unable to be in the State of California on March 17, 2025, I reside in Virginia and have family/child care obligations that week that prevent me from traveling to California and attending the Conference in person. However, my colleague, Mr. Hansen, who will be trial counsel on this case will be appearing in person for the Status Conference, so Plaintiff will have another attorney present for this hearing.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on this 28th of February, 2025, at Roanoke, Virginia.

/s/ Bryan M. Sullivan
Bryan M. Sullivan